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UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF  
PENNSYLVANIA

IN RE: NATIONAL FOOTBALL LEAGUE  
PLAYERS' CONCUSSION INJURY  
LITIGATION

No. 12-md-2323 (AB)  
MDL No. 2323

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THIS DOCUMENT RELATES TO:  
Plaintiffs' Master Administrative Long-  
Form Complaint

**SHORT FORM COMPLAINT**  
IN RE: NATIONAL FOOTBALL LEAGUE  
PLAYERS' CONCUSSION INJURY  
LITIGATION

**ANTHONY RICARDO YOUNG**  
Plaintiff

**JURY TRIAL DEMANDED**

vs.

**NATIONAL FOOTBALL LEAGUE, et al.**  
Defendants

**SHORT FORM COMPLAINT**

1. Plaintiff, Anthony Ricardo Young (Hereinafter referred to as "Young"), brings this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.

2. Plaintiff Young is filing this short form complaint as required by this Court's Case Management Order No. 2, filed April 26, 2012.

3. Plaintiff Young, incorporates by reference the allegations (as designated below) of the Master Administrative Long-Form Complaint, as may be amended, as if fully set forth at length in this Short Form Complaint.

4. Plaintiff Young is a resident and citizen of the Commonwealth of Pennsylvania and claims damages as set forth below.

5. On information and belief, Plaintiff Young sustained repetitive, traumatic sub-concussive and/or concussive head impacts during NFL games and/or practices. On information and belief, Plaintiff Young suffers from symptoms of brain injury caused by the repetitive,

traumatic sub-concussive and/or concussive head impacts the Plaintiff Young sustained during NFL games and/or practices. On information and belief, the Plaintiff Young's symptoms arise from injuries that are latent and have developed and continue to develop over time.

6. Plaintiff Young claims damages as a result of [check all that apply]:

- Injury to Himself
- Injury to the Person Represented
- Wrongful Death
- Survivorship Action
- Economic Loss
- Loss of Services
- Loss of Consortium

7. [Check if applicable] \_\_\_\_\_. Plaintiff Young reserve(s) the right to object to federal jurisdiction.

**DEFENDANTS**

8. Plaintiff Young brings this case against the following Defendants in this action [check all that apply]:

- National Football League
- NFL Properties, LLC
- Riddell, Inc.
- All American Sports, Inc. (d/b/a Riddell Sports Group, Inc.)
- Riddell Sports Group, Inc.
- Easton-Bell Sports, Inc.
- Easton-Bell Sports, LLC
- EB Sports Corporation

— RBG Holdings Corporation

9. [Check where applicable]. As to each of the Riddell Defendants referenced above, the claims asserted are:  design defect;  informational defect;  manufacturing defect.

10. [Check if applicable].  Plaintiff Young wore one or more helmets designed and/or manufactured by the Riddell Defendants during one or more years that Plaintiff Young played in the NFL and/or AFL.

11. Plaintiff Young played in [check if applicable].  the National Football League (“NFL”) and/or in [check if applicable] \_\_\_ the American Football League (“AFL”) during 1985 and Pre-Season of 1986 for the Indianapolis Colts.

### **CAUSES OF ACTION**

12. Plaintiff Young herein adopts by reference the following Counts of the Master Administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts [check all that apply]:

- Count I (Action for Declaratory Relief – Liability (Against the NFL))
- Count II (Medical Monitoring (Against the NFL))
- Count III (Wrongful Death and Survival Actions (Against the NFL))
- Count IV (Fraudulent Concealment (Against the NFL))
- Count V (Fraud (Against the NFL))
- Count VI (Negligent Misrepresentation (Against the NFL))
- Count VII (Negligence Pre-1968 (Against the NFL))
- Count VIII (Negligence Post-1968 (Against the NFL))
- Count IX (Negligence 1987-1993 (Against the NFL))
- Count X (Negligence Post-1994 (Against the NFL))

- Count XI (Loss of Consortium (Against the NFL and Riddell Defendants))
- Count XII (Negligent Hiring (Against the NFL))
- Count XIII (Negligent Retention (Against the NFL))
- Count XIV (Strict Liability for Design Defect (Against the Riddell Defendants))
- Count XV (Strict Liability for Manufacturing Defect (Against the Riddell Defendants))
- Count XVI (Failure to Warn (Against the Riddell Defendants))
- Count XVII (Negligence (Against the Riddell Defendants))
- Count XVIII (Civil Conspiracy/Fraudulent Concealment (Against All Defendants))

13. Plaintiff Young asserts the following additional causes of action [write in or attach]:

None

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**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff, Anthony Ricardo Young, prays for judgment as follows:

- A. An award of compensatory damages, the amount of which will be determined at trial;
- B. For punitive and exemplary damages as applicable;
- C. For all applicable statutory damages of the state whose laws will govern this action;
- D. For medical monitoring, whether denominated as damages or in the form of equitable relief;

- E. For an award of attorneys' fees and costs;
- F. An award of prejudgment interest and costs of suit; and
- G. An award of such other and further relief as the Court deems just and proper.

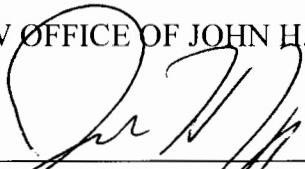
**JURY DEMANDED**

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff Young hereby demands a trial by jury.

RESPECTFULLY SUBMITTED:

LAW OFFICE OF JOHN H. KIEFEL

BY:



Date: 10/17/2012

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